

### REMARKS

The application has been carefully reviewed in light of the Office action, and amended as necessary to better conform with the formal requirements of U.S. practice and to more clearly and particularly describe the subject matter which Applicant regards as the invention.

Prior to this Amendment "B", claims 1-19 were pending in the present application. In this Amendment "B", claims 1, 5 and 15 have been amended and new claim 20 has been added. Accordingly, after this Amendment "B" claims 1-20 are pending in the present application. Reconsideration of the present application in its current format is hereby respectfully requested.

In the Office action, the Examiner rejected claims 1-19 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,264,133 to Herrmann. For at least the reasons set forth below, Applicant traverses this rejection.

The present invention is directed to an installation in which the complex function of handling storage formations and/or supporting elements is split into partial functions that are carried out by separate devices, respectively. The devices are specifically designed to perform the partial functions and to operate independently. Moreover, the devices are designed so that there is no need to transfer the handling storage formations and/or supporting elements between devices. This latter feature is accomplished by a hierarchy, wherein the device of a

higher hierarchy step handles the device of the next lower hierarchy step, i.e., only the primary device handles the storage formation or the supporting element directly.

The function splitting according to the invention regards not only handling functions, but also transport functions (primary, secondary and possibly tertiary transport paths). The devices include a positioning device (primary device) and an operating device (secondary device), wherein the positioning device is designed for holding and transporting a storage formation/supporting element along primary paths, and wherein the orienting device is designed for holding, re-orienting and transporting a positioning device along secondary paths.

A further advantage of the installation according to the invention is the fact that the devices can work simultaneously, not only when directly cooperating, but also when separated from each other and assigned to different jobs. Furthermore, it is possible to provide different quantities of different types of the devices. For example, more devices for performing frequently used and/or longer steps may be provided than devices for performing steps that are short and/or are not used a lot.

The Herrmann patent discloses an installation including a plurality of winding stations W wherein products are wound onto and/or un-wound from roll supports having coupling means 2'. Full roll supports 3 and empty roll supports 3' are stored in a storage positions L. A manipulator 1 having two coupling means 2 is used to move roll supports 3, 3' between the storage positions L and the stations W in an X-direction. The manipulator 1 is also used to move roll supports 3, 3' in a Y-direction to unload and load roll supports 3, 3' from and into the stations W. The coupling

means 2 are arranged so as to face in directions that are disposed 90° to each other. This arrangement permits the manipulator 1 to unload and load one of the stations W in one series of operations. The manipulator 1 initially has an empty roll support 3' coupled to one of the coupling means 2. The manipulator 1 is positioned so that the other coupling means 2 couples with a full roll support 3 disposed in the station W. The manipulator 1 then moves in a Y direction away from the winding station W to remove the full support roll 3 from the station W. The manipulator 1 rotates 90° and then moves in the Y direction back toward the station W and inserts the empty roll support 3' in the station W. After inserting the empty roll support 3', the manipulator 1 with the full support roll 3 is then moved in the Y direction and/or the X direction away from the winding station W.

As set forth above, the manipulator 1 of the Herrmann patent is used to position and retrieve transport roll supports 3, 3' along primary paths (Y direction), as well as to change the orientation of the roll supports 3, 3' and to transport the roll supports 3, 3' along a secondary path (X direction).

In contrast to the Herrmann patent, the present invention is directed to an installation having a positioning device and *a separate* orienting device, wherein the positioning device is for positioning and retrieving supporting elements and for transporting the supporting elements along primary paths, and wherein the orienting device is for transporting positioning devices along a secondary transport path and for changing an orientation thereof. Since the manipulator 1 of the Herrmann patent performs both positioning and orienting functions, it is clear the Herrmann patent fails

to show or suggest (with emphasis added) "at least one positioning device" and "at least one orienting device (6, 6')", wherein "*the at least one positioning device and the at least one orienting device are operable independently of each other*", as is presently recited in independent claim 1. It also manifestly clear that the Herrmann patent fails to show or suggest (with emphasis added) "*at least one orienting device (6, 6') for transporting the at least one positioning device*", as is also presently recited in independent claim 1.

For at least the reasons set forth above, Applicant submits that the Herrmann patent fails to show or suggest independent claim 1. Applicant considers it apparent that the Herrmann patent also fails to show or suggest claims 2-20 since they all depend from claim 1 and recite additional novel features of the present invention.

In light of the foregoing, it is respectfully submitted that the present application is in a condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in a condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any additional fees resulting from this communication, please charge same to our Deposit Account No. 18-0160, our Order No. FRR-12920.

Respectfully submitted,

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